

# Wild Time Zoological Center

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January 18, 2004

Division of Dockets Management (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville MD 20852

Re: Control of Communicable Diseases: Restrictions on African Rodents, Prairie Dogs, and Certain Other Animals Federal Register: November 4, 2003 (Volume 68, Number 213) and OMB control number 0910-0519 (for 21 CFR 1240.63) and OMB control number 0920-0615 (for 42 CFR 74.56) Docket Number

As a small business owner, educator, and former science teacher, I have a few comments and suggestions in response to the above referenced docket.

My name is Marc Cohen. In May of 1985, I graduated from the University of Maryland with a BS in Zoology and a BS in Science Education. After graduating, I taught science in Baltimore County. While teaching, I was surprised to discover how many exotic animals were for sale on the open market. It occurred to me then that many of these animals might make great teaching resources. I began acquiring animals for my classroom and also used for presentations at children's parties. Eventually, I left teaching to perform traveling animal presentations at schools, day care centers, camps, children's parties, and community events.

Today, I continue to perform traveling programs and also operate on-site programming as well. WILD TIME ZOOLOGICAL CENTER at SAFARI PARTY has become a favorite location for children's parties and a popular destination for school field trips from all over Maryland, as well as from Washington, D.C., and the surrounding states. Currently, my seven staff members and I host approximately 700 programs per year and provide permanent homes for about 50 animals. In general, the public has received us warmly and seems to value the rare opportunity to experience wildlife up-close and personal.

I have the following concerns and suggestions regarding the proposed ban on the movement of prairie dogs:

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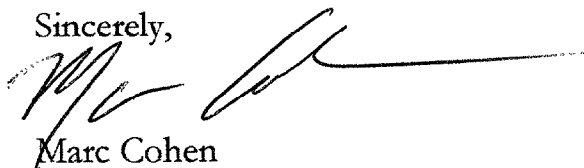
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- A. Prairie dogs are an interesting and engaging animal about which the public is interested in learning. They are also hardy and easy to keep and can be handled by most of our presenters; thus, they are a model education animal. The loss of this species puts off-limits yet another great education animal.
- B. The FDA's actions will set precedents for restrictions on numerous other animals. As we become aware of more and more zoonotic diseases as animals become rarer in the wild (regardless of large captive populations), and as escaped exotics come to be regarded as invasive, the rationale for restricting the movement of exotic animals grows and the number of animals available for education dwindles.
- C. The majority of our animals are by-products of the pet trade. Although I do not believe that just anyone should have access to exotic animals, the complete liquidation of the pet trade for prairie dogs, and eventually other species of exotics, would eliminate the only real source of animals available to small educational operations.
- D. Although the FDA may loosen restrictions if monkey pox comes under control, the proposed ban will no doubt be promulgated and strengthened by animal rights groups motivated by politics, not by science or public health concerns.
- E. Since the main consideration in the prairie dog ban is zoonosis, not pet ownership, why not require that animals be quarantined by specially licensed veterinarians before permits are issued? This action would reduce the volume of movement and, though perhaps more expensive, it would not destroy pet owner rights. I agree that monkey pox is a serious issue, but I am not sure that categorical denial of pet ownership is fair or constitutional.

I urge you to consider more careful control of these animals—through quarantine, microchipping, and careful distribution of permits—rather than the elimination of this aspect of the pet trade. It would be impossible for a small organization with limited financial resources like ours to breed every species of animal that we need. If exotic pet owners who periodically surplus unwanted animals were to cease to responsibly propagate and care for these animals, our reservoir of animals would evaporate. As time and attrition took its toll, interactive family-friendly animal programs would eventually disappear.

Sincerely,



Marc Cohen

Owner/Operator

Wild Times Zoological Center